



STATE OF NEW MEXICO

ENVIRONMENTAL IMPROVEMENT DIVISION

P.O. Box 968, Santa Fe, New Mexico 87504-0968

(505) 827-0070

TONEY ANAYA
GOVERNOR

DENISE D. FORT
DIRECTOR

December 26, 1985

CERTIFIED MAIL NO. P 176 061 913
RETURN RECEIPT REQUESTED

Mr. Harold E. Valencia
Area Manager
Dept. of Energy
Los Alamos National Laboratory
Los Alamos, New Mexico 87544

Dear Mr. Valencia:

This letter constitutes Air Quality Permit Number 632 which is issued to the Los Alamos National Laboratory pursuant to Section 74-2-7 NMSA and Air Quality Control Regulation 702, to construct and operate a beryllium machine shop in TA-35 Building 213 near Los Alamos, New Mexico. The facility is to be constructed and operated in accordance with the application dated October 11, 1985 and is subject to the following conditions:

1. Beryllium emissions to the atmosphere shall not exceed 4×10^{-7} pounds per hour (4×10^{-7} tons per year).
2. Records of emission test results and other data needed to determine total emissions shall be retained at the source and made available, for inspection by the Division, for a minimum of two years.

The Division has performed an analysis to verify the emissions from the proposed machine shop and has performed dispersion modeling using emission estimates from the facility to determine the impact on the ambient air. Based on the analysis and the control measures described in your application, the Division has determined that the provisions of the Air Quality Control Act, Air Quality Control Regulation 751, and the ambient air quality standards will be met. However, in order to assure this, conditions have been placed on the permit. The Air Quality Control Act allows the Division to place reasonable restrictions other

0 7 6 7 2 6 9 9

Mr. Harold E. Valencia
December 26, 1985
Page Two

than those relating to emission rates. The reasons for these conditions are explained below:

Condition 1 regarding the emissions from the beryllium machine shop corresponds to the emission limit specified in the application. The Air Quality Control Act allows for placement of an emission limit and requires that such a limit be only as restrictive as the more stringent of the following: 1) the extent necessary to meet the requirements of the Air Quality Control Act and the Federal Act; or 2) the emission rate specified in the permit application. The emission rate specified in the permit application has been determined to be more stringent in this case.

Condition 2 corresponds to the reporting and record keeping requirements contained in AQCR 751 which incorporates the National Emission Standards for Hazardous Air Pollutants (NESHAPS), by reference.

Section 74-2-7.K NMSA 1978 provides that if the Division issues a permit with conditions, and the applicant is dissatisfied with the action taken by the Division, the applicant may request a hearing before the Environmental Improvement Board. The request must be made in writing to the Director of the Environmental Improvement Division within thirty days after receipt of the permit.

Additionally, there are requirements other than those contained in the permit that should be noted. Air Quality Control Regulation 702 requires the following:

Section M provides that the Division may cancel a permit if the construction is not commenced within one year from the date of issuance or, if during the construction, work is suspended for a period of one year.

Section P requires the permitted source to notify the Division in writing of the:

1. anticipated date of initial startup of a source not more than sixty days nor less than thirty days prior to the date, and
2. actual date of initial startup of a source within fifteen days after the startup date.

AQCR 751 requires that each owner or operator to test emissions from the new source within 90 days of startup.


Mr. Harold E. Valencia
December 26, 1985
Page Three

A performance test is required for beryllium and shall be performed in accordance with EPA Reference Method 103 or 104 as outlined in 40 CFR Part 61 Appendix B. The permittee should arrange a pretest meeting with the Division at least two weeks prior to the date of testing and should advise the Division of any variations to the procedures. The results should be submitted to the Division within forty-five days after the completion of testing.

The permit and conditions apply in the event of any change in control or ownership of the facility. In the event of any such change in control or ownership, the permittee should notify the succeeding owner of the permit and conditions. The permittee should arrange a pretest meeting with the Division at least two weeks prior to the date of testing and should advise the Division of any variations to the procedures. The results should be submitted to the Division within forty-five (45) days after the completion of testing.

If you have any questions regarding this permit please contact David Duran or A. S. Shankar.

Sincerely,


J. David Duran
Acting Bureau Chief

DD:lo

xc: Tito Madrid, District Manager, District II
Gerald Silva, Health Program Manager, Espanola
Bruce Nicholson, Program Manager, Modeling and Analysis
Jack Divita, EPA Region VI, Dallas